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May 19, 2022

Honorable George C. Hanks, Jr.  
United States District Court  
Southern District of Texas

**Re: Status of cause no. 4:19-CR-832; *United States v. Gerald M. Goines, et. al.***

Judge Hanks:

The United States and Gerald Goines jointly propose the Court continue the status hearing scheduled for May 24, 2022 for 90 days.

When the parties last appeared before the Court on March 3, 2020, it was prior to the institution of COVID-19 related stay-at-home orders in Texas. Since then, the COVID-19 pandemic has placed restrictions on all the parties and has affected the ability of each party to review discovery. Throughout this time, the United States has produced discovery, including a voluminous amount over the past few months, which the defense is continuing to review. Additionally, the related case in State District Court is currently scheduled for motions hearings on August 15, 2022. After 90 days and the motions hearings in state court, the parties should be in a better position to articulate an appropriate schedule for motions deadlines, pretrial conference and trial, if one is needed.

Finally, because of the case's complexities, the parties respectfully request the Court continue the status conference under 18 U.S.C. § 3161(h)(7)(B)(i) & (ii) for 90 days.

Respectfully submitted,

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